UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 3 2014

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7009 1680 0000 7675 2206
RETURN RECEIPT REQUESTED

FOIA Exemption (b) (6)
FOIA Exemption (b) (6), DVM
FOIA Exemption (b) (6)
Owners, Northwest Illini Feedlots, Inc.
12490 Illinois Route 73
Lanark, Illinois 61046

Subject: September 10, 2014 Compliance Evaluation Inspection

Dear Sirs:

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the Concentrated Animal Feeding Operation inspection conducted at Northwest Illini Feedlots, Inc. on September 10, 2014. The purpose of the inspection was to evaluate and document compliance of Northwest Illini Feedlots, Inc. with the Clean Water Act (CWA).

Should you find anything in the report that you disagree with, please provide a detailed response within thirty (30) calendar days.

Thank you for your prompt attention to this matter. If you have any questions, please contact Joan Rogers of my staff, at (312) 886-2785.

Sincerely,

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

cc: Lee Heeren, IEPA
Chuck Corley, IEPA
Bud Bridgewater, IEPA

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:
Compliance Evaluation Inspection

Facility:
Northwest Illini Feedlots 815-493-2111
12490 Illinois Route 73
Lanark, Illinois 61046
Carroll County
42.116N, 88.835W

NPDES Permit Number:
ILA010093 (Expires September 30, 2014)

Date of Inspection:
September 10, 2014

EPA Representatives:
Joan Rogers, Environmental Scientist/Enforcement Officer 312-886-2785
rogers.joan@epa.gov

Don Schwer, Enforcement Officer 312-353-8752
Schwer.don@epa.gov

State Representatives:
None

Facility Representatives:
FOIA Exemption (b) (6), DVM, Owner FOIA Exemption (b) (6)

FOIA Exemption (b) (6), Owner FOIA Exemption (b) (6)

Report Prepared by:
Joan Rogers, Environmental Scientist

Report Date:
October 20, 2014

Inspector Signature Joan Rogers

1. BACKGROUND

The purpose of this report is to describe, evaluate and document the Northwest Illini Feedlots' compliance with the Clean Water Act (CWA) at its Lanark, Illinois facility on September 10, 2014. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

Northwest Illini Feedlots (NWIF) is a large cattle feedlot operation. The facility confines approximately 2300 head of cattle and is therefore considered a large Concentrated Animal Feeding Operation (CAFO).

On June 19, 2014, a representative from Illinois Environmental Protection Agency (IEPA) inspected the facility. During that inspection, the IEPA representative did not observe any discharges of manure or process wastewater and recommended that the facility owners install a small gravel berm or swale outside the feed storage area to direct all runoff toward the concrete reception pit.

Surface flow on the production area is generally to the south except for the former outdoor feedlots to the west of the barns. That area flows to the west. There is an intermittent unnamed tributary on the west side of the facility that flows to the south. Straddle Creek, a perennial stream, flows from east to west on the south side of the production area. Straddle Creek flows 5.4 miles to perennial Carroll Creek which in turn flows 14.5 miles to the Plum River. The flow would then go another 16 miles to the Mississippi River. The Plum River is on the 2004 303d list of impaired waters and it is listed as impaired for habitat alteration, nutrients, total nitrogen, sediment and turbidity.

In the recent past, the facility has changed ownership and the new owners have discontinued the use of the outside earthen feedlots and have reduced the number of animals at the site.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	9:28 A.M.
Temperature:	68°F
Precipitation:	Greater than 1" in the morning before the inspection.
Presented credentials?	Yes
Credentials presented to whom and at what time?	The owners
EPA vehicle parked in approved location?	Yes
Location where EPA vehicle was parked?	Outside the office
Disposable boots worn?	Yes
Other bio-security measures taken:	None

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used	
R5 CAFO Boilerplate Inspection Report as Checklist	
Facility Documents Reviewed:	
Comprehensive Nutrient Management Plan (CNMP)	
Front page of the NPDES Permit	
Facility's depth of manure in lagoon inspection documentation of depth of manure and process wastewater and records of the dates that the berms were mowed.	
Manure Haul Away Load Log for June and July 2014	
5/2014-8/2014 Mortality Records	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No

Table 3: Facility Description

Type of Animal	**Number of Animals**	**Capacity**	**Type of Confinement**
Cattle	2400	2500	(2) Open Barns
			(1) Sick Pen

Minimum Number of Animals in previous 5 years:	1500
Maximum Number of Animals in previous 5 years:	4000
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:	2400
Amount of Liquid Manure Generated per year:	5,305 gal
Amount of Solid Manure Generated per year:	64,978 tons
(Illinois Only) Name of Certified Livestock Manager for facility: (if 300 animal units or greater):	FOIA Exemption (b) (6) [redacted] and FOIA Exemption (b) (6) [redacted] (owner)
(Illinois Only) If 1000 < AU < 5000 is a general waste management plan maintained at the facility?	Yes
(Illinois Only) If AU > 5000 has a general waste management plan been submitted to the IDOA?	N/A
Does the facility have an NPDES Permit?	Yes
SIC or NAICS code:	0211
CAFO Designation Date (If a designated CAFO)	Not designated, but defined as a CAFO
CAFO Designation Reason (If a designated CAFO)	Not designated, but defined as a CAFO
Do animals have direct access to WOUS?	No

Are crops, vegetation, forage growth, or post harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?	No
What is the area (acres) of the production area?	35 acres
What is the area (acres) of the pasture?	None
How many employees (not counting family members)?	EPA did not request this information.
Other facilities under common ownership (name and address):	
None	

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Bed Pack	6 months	N/A	N/A	Between turns	64,978 tons (per year)	180
Lagoon	10 million gallons	Clay	Yes	2012	Unknown	>365
Concrete bunkers	2 weeks	Concrete	N/A	2 weeks prior	Unknown	14
Records at site of storage structure design?				No		
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.				Yes. Scrapped bed pack is stored in concrete bunkers.		
Are records kept of the level of manure in the storage structures?				Yes		
When was the last time a storage structure was emptied, either partially or completely?				In 2012, some solids were taken out but mostly liquids.		
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?				Unknown		
Do the facility personnel inspect and keep records of all diversion devices?				Yes		
Do the facility personnel inspect and keep records of all impoundments?				Yes		
Do the facility personnel inspect and keep records of all the water lines?				Yes		
Do the facility personnel perform routine visual inspections and keep records of the production area?				Yes		
Does the waste storage system have a managed outfall or discharge point?				No		

Has the facility had any documented discharges of livestock waste to surface water in the past year?	No
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	No

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
The bed pack in the barns is left intact for 6 months and replaced between turns. Material scraped from around the edges of the bed pack is stacked in the concrete bunkers in the barns. Bunkers are full in about a week to two weeks. All solid material is removed from the site by a third party (Midwest Agri Services) for land application and composting. The lagoon receives the leachate from the feed storage area and the runoff from the outdoor receiving pens.	
Describe the way used bedding is collected and disposed of at the facility:	
Stacked in the concrete bunkers in the barns before being removed by a third party.	
Are mortality records kept?	Yes
Describe the way mortalities are managed at the facility:	
The mortalities are rendered by a third party rendering company.	
What type of method is used to provide drinking water for the animals?	Tanks with automatic floats are available for the cattle for drinking water.
Describe the way spilled drinking water is collected and disposed of at the facility:	
Spilled drinking water is handled with the manure and bed pack.	
Describe the way mist cooling water is collected and disposed of at the facility:	
Sprinklers are used and process wastewater from the sprinkling is handled with the manure and bed pack.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
Other than pharmaceuticals, no chemicals are at the facility.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
There is no flushing of the barns.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	

Feed is contained in concrete bunkers and commodities are stored under roof in a commodities barn.

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes
Describe the process to take the manure and/or process wastewater sample.	Samples are taken two times per year and sent to Midwest Lab.
Number of acres available for land application:	None
Are land application records kept?	No, because all manure is transferred to a third party.
Who applies the manure and process wastewater to the fields?	Midwest Agri Services takes ownership of the manure.
Are weather conditions at time of application kept? (24 before – 24 after)	N/A
Does the facility perform and keep records of the soil testing?	N/A
Is manure transferred off-site to another party?	Yes
Are manure transfer records maintained?	Yes
Do facility personnel perform periodic inspection of land application equipment?	N/A

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
Surface flow on the production area is generally to the south except for the former outdoor feedlots to the west of the barns. That area flows to the west. There is an intermittent unnamed tributary on the west side of the facility that flows to the south. Straddle Creek, a perennial stream, flows from east to west on the south side of the production area.	
How many months out of the year is there flow in the nearest surface water pathway:	12 months
Are there any storm water pathways entering the facility?	No
Are there any clean water ponds on site?	No
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	Mississippi River
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Perennial

Has the surface water pathway nearest to the facility been assessed for water quality?	No

Table 8: Nutrient Management Plan

NMP on site?	Yes
Date NMP Submitted:	2008
Planner Name/Company:	Maurer-Stutz
Date that the NMP was last updated:	2008
Storage Description in NMP?	Yes
Amount of Manure Generated:	5305 gallons and 64,978 tons of manure
Capacity of Storage:	10 million gallons
Duration of Storage:	Greater than two years
Amount of Spreadable Land:	3,600 acres in a 5 year agreement
Mortality Management Plan:	None observed in NMP
Clean Water Diversion System:	None observed in NMP
Direct Contact Prevention Plan:	None observed in NMP
Chemical Management Plan:	None observed in NMP
Conservation Practices:	Yes
Manure Testing Protocols:	None observed in NMP
Soil Testing Protocols:	N/A
Land Application Protocols:	N/A
Additional NMP comments:	None
Does the NMP reflect the current operational characteristics?	No. NMP is written for manure to be land applied on the fields in the NMP, but all manure is sold.
Are the number of acres owned/leased consistent with what is listed in the NMP?	Yes

Table 9: Land Application Records (details of the records reviewed)

No land application records were present since the facility does not land apply their manure to their fields. All manure is sold to a third party for land application on fields not owned by NWIF and for composting.

Table 10: Facility Records (details of the records reviewed)

Diversion devices:	Did not review
Impoundments:	Notebook with berm mowings
Depth marker observations:	Notebook with depth of manure in lagoon
Water Lines:	Did not review
Mortality handling:	Mortality Record from 5/2014-8/2014
Storage Structure Design:	Did not review
Overflow records:	No overflows

Crop Yields:	N/A
Land Application Dates:	N/A
Weather Conditions at time of application (24 before-24 after):	N/A
Test Methods for Manure Testing:	Did not review
Test Methods for Soil Testing:	N/A
Manure Test Results:	Manure analysis appears to be book values
Soil Test Results:	N/A
Calculations of N and P applied:	N/A
Application Methods:	N/A
Application Equipment Inspection Dates:	N/A

Table 11: NPDES Permit

Type of permit (General, individual)	General
Is a copy of the permit on site?	Front page is on site. Did not observe the rest of the permit on the day of the inspection.
Date that the permit was issued:	October 20, 2009
Date that the permit will expire:	September 2014
Permitted number of animal units:	Did not observe
Does the permit contain a compliance schedule? If yes, provide a detailed description of the requirements and the status.	Did not observe
Have there been any changes made to the production area since the permit was issued? If yes, provide a detailed description.	Did not observe
Are there any practices in the permit that are not being done at the facility? (Records kept, inspections performed, etc.)	Did not observe

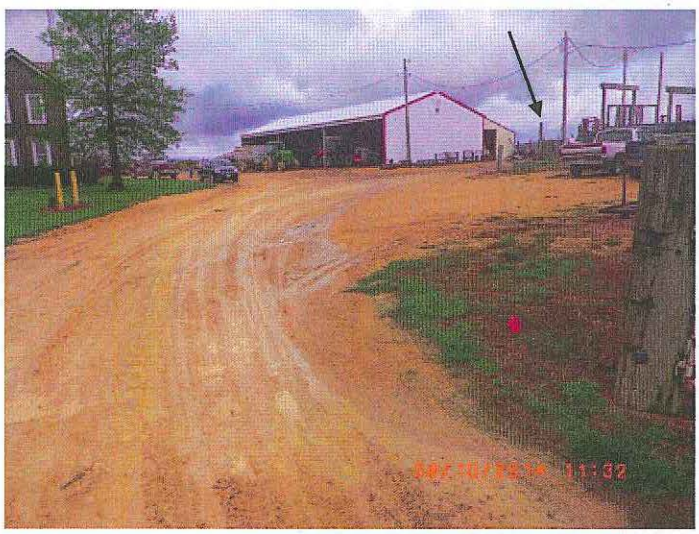
2.2 Walkthrough of the Facility

EPA began the walkthrough on the south side of the Sort Alley. Surface flow off the Sort Alley would flow to the south and to a pipe at ground level. The pipe would transport any manure or process wastewater to the Lagoon directly to the south.

1: IMGP1363
Description: Sort Alley is slanted so surface runoff would flow to the south.
Location: South of Sort Alley
Camera Direction: North
Date/Time: September 10, 2014 11:32 A.M.

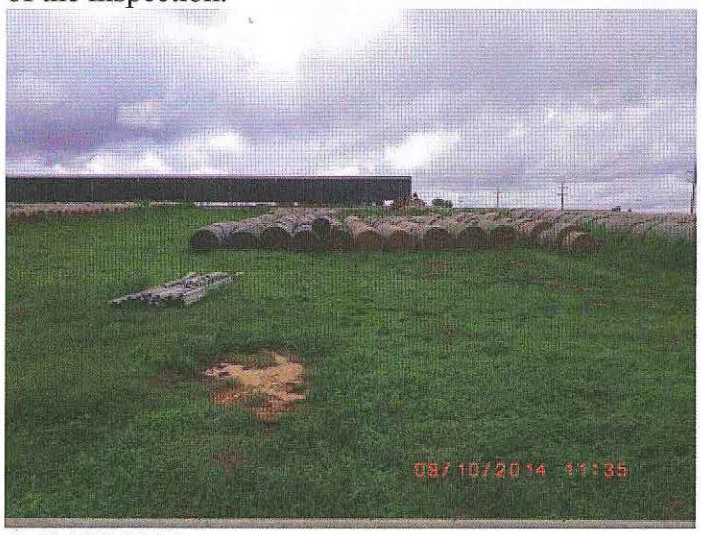
2: IMGP1364
Description: Flow off the Sort Alley goes into this inlet south of the alley.
Location: South of the Sort Alley
Camera Direction: Down
Date/Time: September 10, 2014 11:32 A.M.

Manure and process wastewater also could run off from the west side of the Sort Alley. It would then flow south down the facility driveway and to the Lagoon.



3: IMGP1365
Description: Process wastewater from the west side of the Sort Alley (black arrow) would flow along the driveway to the south and east and then flow to the Lagoon.
Location: Southwest corner of round bale storage area
Camera Direction: Northwest
Date/Time: September 10, 2014 11:32 A.M.

South of Barn B, former dirt feedlots have been abandoned as animal confinement areas and now are where round bales are stored. The area was completely vegetated on the day of the inspection.



4: IMGP1366
Description: Round bales are stored in the yard south of Barn B.
Location: South of Barn B
Camera Direction: North
Date/Time: September 10, 2014 11:35 A.M.

5: IMGP1367
Description: Looking back along the southern edge of the yard where the round bales are stored.
Location: Southeast corner of the yard south of Barn B
Camera Direction: West
Date/Time: September 10, 2014 11:35 A.M.

A storm water inlet at the southeast corner of the former feedlots transports flow to under the facility driveway and to the yard to the south. The flow of storm water would flow to the south and to Straddle Creek.

6: IMGP1368
Description: Storm water inlet in the southeast corner of the yard.
Location: Southeast corner of the yard south of Barn B
Camera Direction: Down
Date/Time: September 10, 2014 11:35 A.M.

7: IMGP1369
Description: Storm water outlets in grassed area south of the facility driveway and flows to Straddle Creek.
Location: Facility driveway near IL Route 73
Camera Direction: Southwest
Date/Time: September 10, 2014 11:35 A.M.

Corn silage is stored in concrete bunkers south of the facility driveway. Additional commodities are stored in a Commodities Barn in the Feed Storage Area. Process wastewater from the Feed Storage Area flows to the north and to a concrete Catch Basin. A dirt berm on the ground directs the flow to the Catch Basin. A pipe at the bottom of the basin transports the process wastewater to the Lagoon.

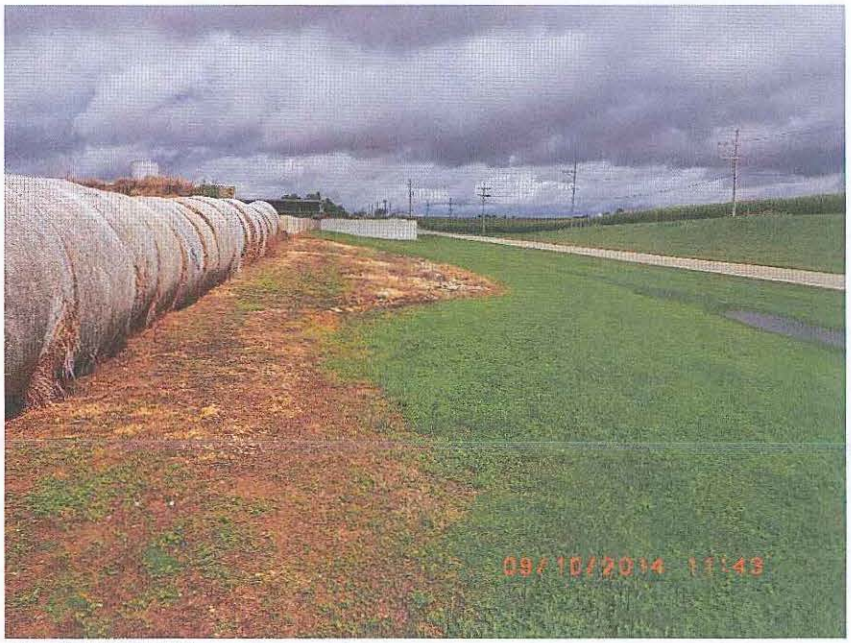
8: IMGP1370
Description: Catch Basin for silage leachate is located at the northwest corner of the Feed Storage Area.
Location: Feed Storage Area
Camera Direction: Down
Date/Time: September 10, 2014 11:38 A.M.

9: IMGP1371
Description: Silage leachate flows over the ground to the Catch Basin.
Location: Feed Storage Area
Camera Direction: South
Date/Time: September 10, 2014 11:39 A.M.

10: IMGP1372
Description: Silage leachate flows over the ground to the Catch Basin.
Location: Feed Storage Area
Camera Direction: North
Date/Time: September 10, 2014 11:39 A.M.

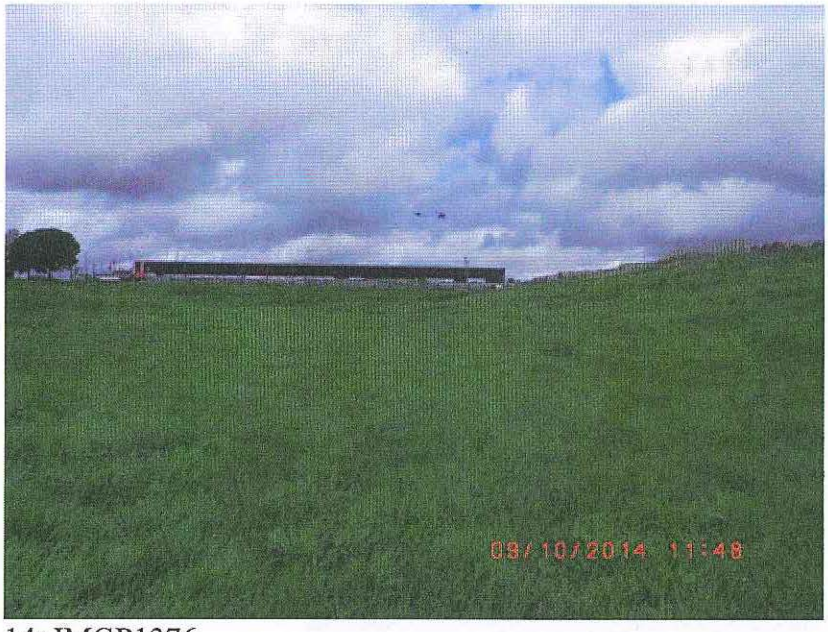
EPA walked south between the Feed Storage Area and the road. Additional round bales were stored south of the concete feed bunkers. The area east of the Feed Storage Area was vegetated and the concrete bunker walls were well maintained. The facility owners had created a second ditch parallel to the roadside ditch to capture any process wastewater that might flow to the east from the Feed Storage Area.

11: IMGP1373
Description: Concrete feed bunker wall facing IL Route 73.
Location: East side of Feed Storage Area
Camera Direction: North
Date/Time: September 10, 2014 11:42 A.M.



12: IMGP1374
Description: South of the concrete bunkers, round bales are stored.
Location: East of Feed Storage Area
Camera Direction: North
Date/Time: September 10, 2014 11:43 A.M.

13: IMGP1375
Description: Round bales stored south of the concrete bunkers of the Feed Storage Area.
Location: East of Feed Storage Area
Camera Direction: West
Date/Time: September 10, 2014 11:47 A.M.



14: IMGP1376
Description: The facility owners have created a secondary ditch to collect any runoff from the round bale area so it won't access the roadside ditch.
Location: East of Feed Storage Area
Camera Direction: South
Date/Time: September 10, 2014 11:48 A.M.

15: IMGP1377
Description: Round bale storage south of concrete feed bunkers.
Location: East of Feed Storage Area
Camera Direction: West
Date/Time: September 10, 2014 11:48 A.M.

EPA walked to the west to the south side of the Lagoon. EPA observed the depth marker in the Lagoon and noted that there was approximately four feet of freeboard.

16: IMGP1378
Description: Capacity depth marker in the Lagoon.
Location: Southeast corner of the Lagoon
Camera Direction: North
Date/Time: September 10, 2014 11:50 A.M.

EPA then walked north along the west side of the Lagoon. The Lagoon is irregularly shaped with an island of solids in the middle. The northwest part of the Lagoon has been bermed off and it receives manure runoff that is higher in solids than the flow from the Sort Alley or the Feed Storage Area. The sources of the runoff to the northwest part of the Lagoon are the Receiving Pen 14 and the Sick Barn area. The solids are allowed to settle out in the northwest part and the solids are dug out occasionally. Overflow from the northwest part of the Lagoon flows to the southern part.

On the day of the inspection the berms were well mowed and there was no woody vegetation growing in them.

17: IMGP1379
Description: Lagoon has over four feet of freeboard in it.
Location: Southeast corner of the Lagoon
Camera Direction: Northwest
Date/Time: September 10, 2014 11:55 A.M.

18: IMGP1380
Description: Lagoon has over four feet of freeboard in it.
Location: Southwest corner of the Lagoon
Camera Direction: East
Date/Time: September 10, 2014 11:55 A.M.

19: IMGP1381
Description: Berm across the northwest part of the Lagoon allows solids to settle in the smaller part of the Lagoon.
Location: Northwest corner of the Lagoon
Camera Direction: Northeast
Date/Time: September 10, 2014 11:58 A.M.

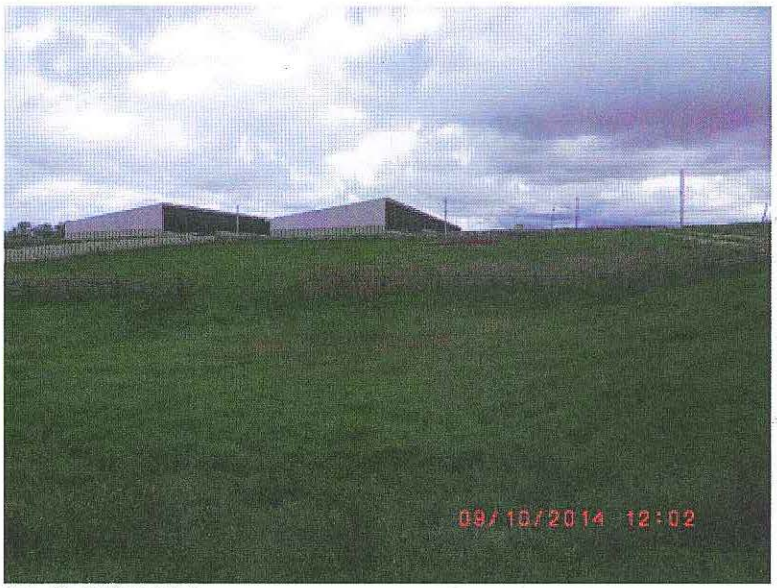
20: IMGP1382
Description: Process wastewater from the Sick Barn and Pens 4, 5, and 6 flow to the west directly to the bermed off part of the Lagoon.
Location: Northwest corner of the Lagoon
Camera Direction: Northeast
Date/Time: September 10, 2014 12:01 P.M.

21: IMGP1383
Description: Process wastewater from the Sick Barn and Pens 4, 5, and 6 flow to the west, down the grassed hill, to the bermed off part of the Lagoon.
Location: Northwest corner of the Lagoon
Camera Direction: East
Date/Time: September 10, 2014 12:01 P.M.

22: IMGP1384
Description: The bermed off part of the Lagoon allows solids to settle out before overflowing into the main part of the Lagoon.
Location: Northwest corner of the Lagoon
Camera Direction: Southeast
Date/Time: September 10, 2014 12:01 P.M.

23: IMGP1385
Description: Lagoon berms are well maintained with no woody growth and the vegetation is kept mowed.
Location: Northwest corner of the Lagoon
Camera Direction: South
Date/Time: September 10, 2014 12:01 P.M.

Earthen feedlots on the west side of the facility are not used to confine animals anymore. They have been vegetated.



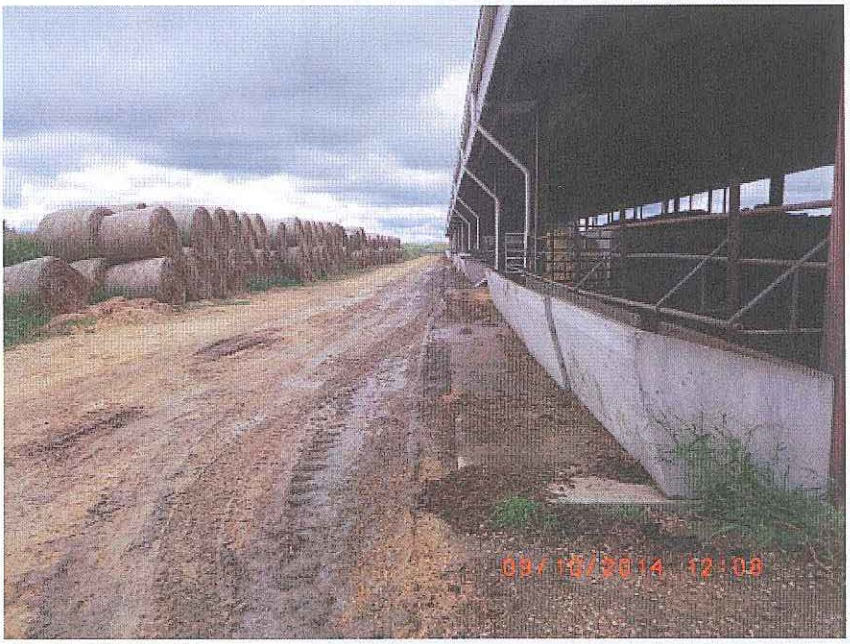
24: IMGP1386
Description: The lots to the west of the barns are not used to confine animals anymore.
Location: North of the Lagoon
Camera Direction: Northeast
Date/Time: September 10, 2014 12:02 P.M.

25: IMGP1387
Description: Intermittent unnamed tributary of Straddle Creek is on the west side of the facility.
Location: North of the Lagoon
Camera Direction: Southwest
Date/Time: September 10, 2014 12:03 P.M.

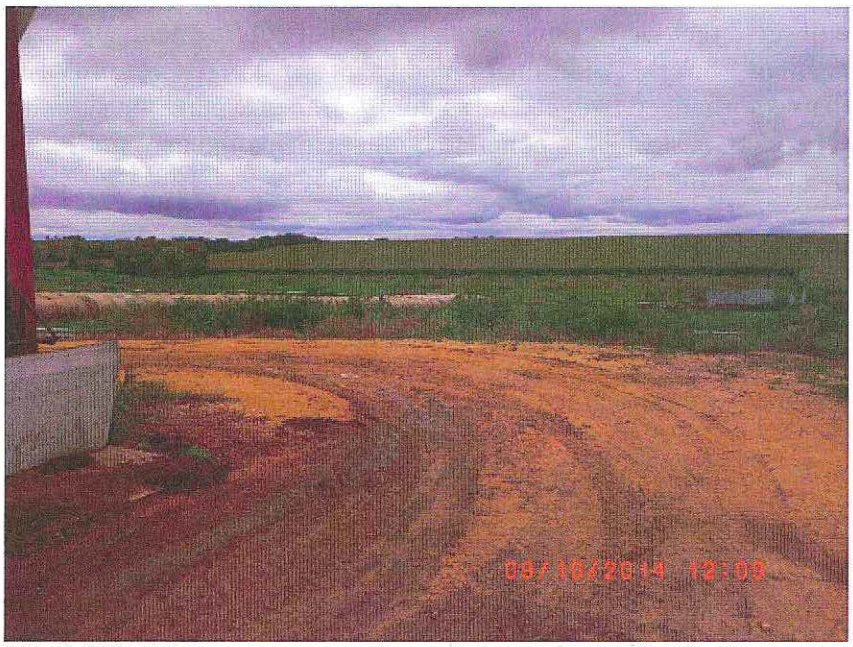
EPA then walked east to observe the two freestall barns for animal confinement, Barn A and Barn B. Barn A is north of Barn B. Additional round bales are stored north of Barn A. The bed pack in the barns is changed between turns but is scraped around the sides and the manure and used bedding is stacked in concrete bunkers inside the barn until it is loaded onto Midwest Agricultural trucks.

The barns have gutters on them and the downspouts are tied to an underground pipe which outlets the storm water at the intermittent unnamed tributary northwest of the former dirt feedlots on the west side of the facility.

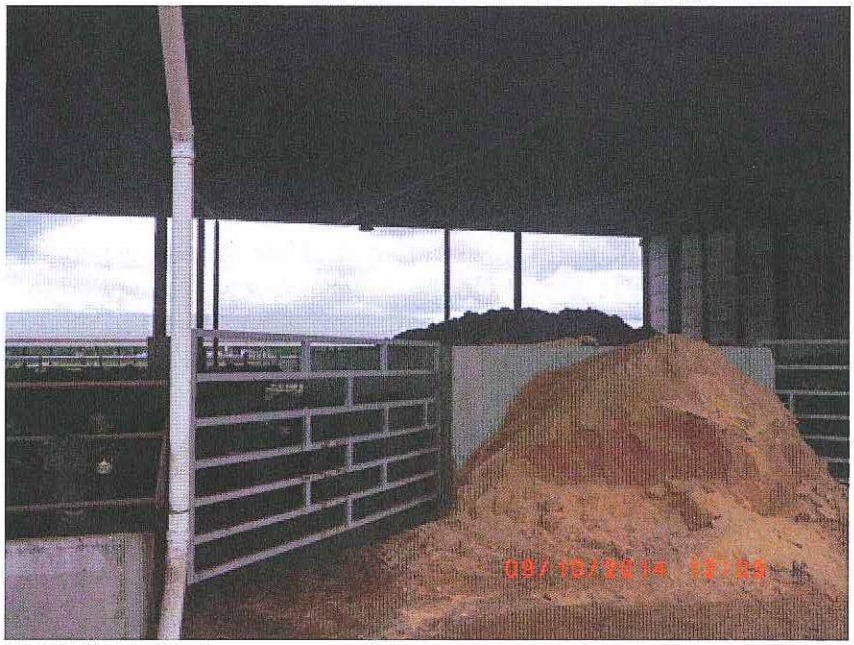
EPA did not see any compliance issues with the barns on the day of the inspection.



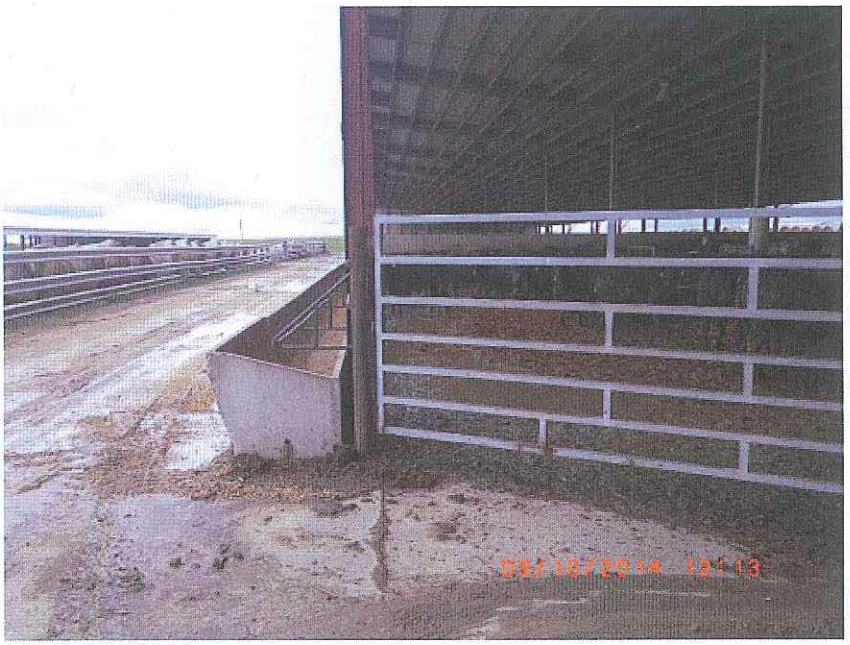
26: IMGP1388
Description: Round bales are stored on the north side of Barn A. Note the downspouts from the gutters on the barn. Roof water is directed to the downspouts which are tied to an underground pipe which outlest the storm water to the intermittent unnamed tributary.
Location: Northwest corner of Barn A
Camera Direction: East
Date/Time: September 10, 2014 12:08 P.M.



27: IMGP1389
Description: Downspouts from gutters outlet near the intermittent unnamed tributary near the northwest corner of the dirt lot to the west of Barn A.
Location: Northwest corner of Barn A
Camera Direction: West
Date/Time: September 10, 2014 12:09 P.M.

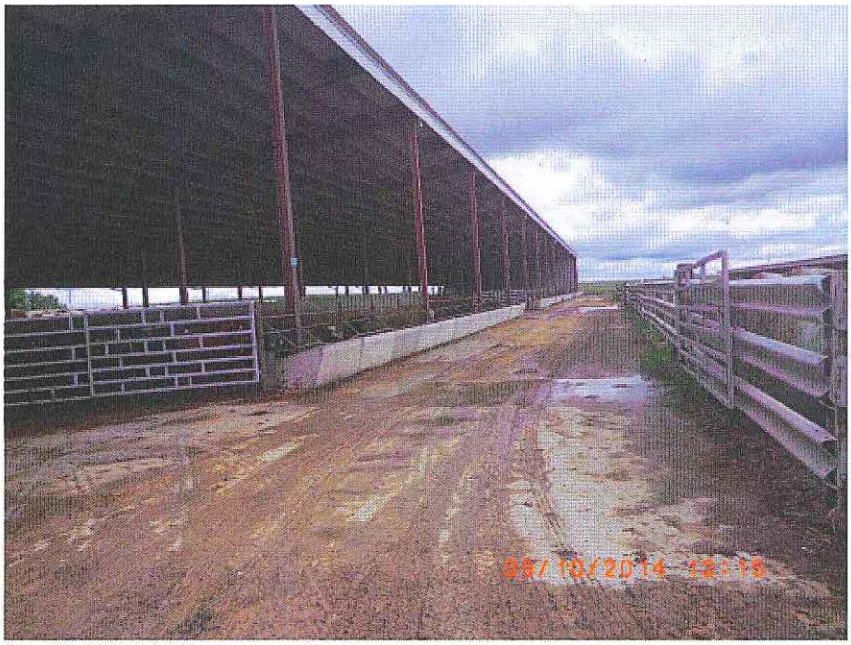


28: IMGP1390
Description: New sand pile under the barn roof.
Location: Barn A
Camera Direction: South
Date/Time: September 10, 2014 12:09 P.M.



29: IMGP1391
Description: Bed pack in the middle of the barn. The barn edges are scraped daily.
Location: Southeast corner of Barn A
Camera Direction: West
Date/Time: September 10, 2014 12:13 P.M.

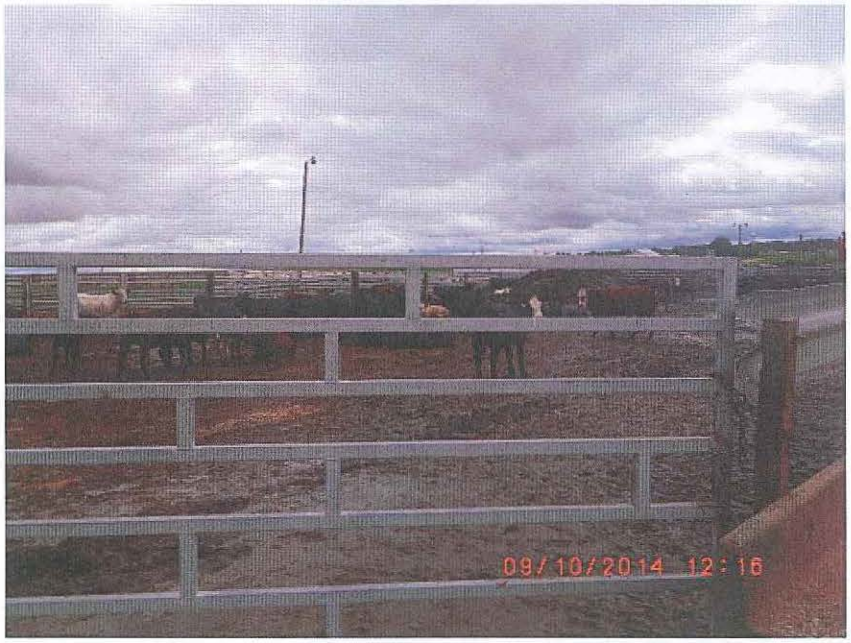
30: IMGP1392
Description: Scraped manure and bed pack is stacked in concrete bunkers inside the barn.
Location: South side of Barn A
Camera Direction: North
Date/Time: September 10, 2014 12:13 P.M.



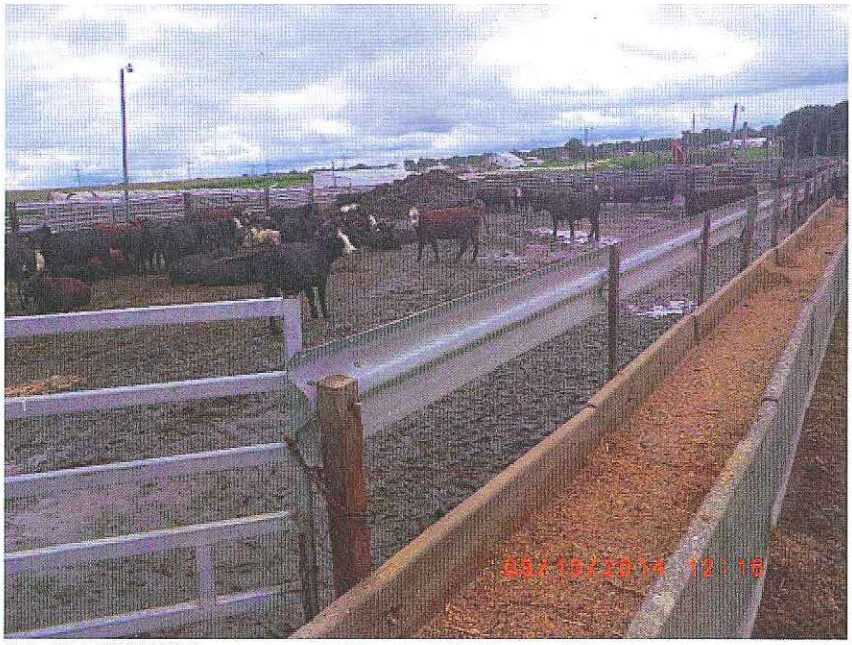
31: IMGP1393
Description: Driveway on south side of Barn A.
Location: Southwest corner of Barn A
Camera Direction: East
Date/Time: September 10, 2014 12:15 P.M.

32: IMGP1394
Description: Driveway on north side of Barn B.
Location: Northwest corner of Barn B
Camera Direction: East
Date/Time: September 10, 2014 12:15 P.M.

EPA walked east on the north side of Barn A and then west between the barns. EPA then walked south on the west side of the receiving pens. Cattle are in the receiving pens for a few days after arriving at the facility before being moved to a barn. The receiving pens are open dirt lots. Receiving Pen 14 is north of Receiving Pen 16. Runoff of manure and process wastewater from Receiving Pen 14 flows to the northwest corner of Receiving Pen 16 where it flows into an pipe inlet at ground level. The pipe outlets at the top of the hillside west of the driveway. The manure and process wastewater would flow down the hillside to the northwest part of the Lagoon. Manure and process wastewater from the Sick Barn with three small open pens on the west side of the driveway also would flow down this hillside to the northwest part of the Lagoon.



33: IMGP1395
Description: Cattle in the Receiving Pens 14 and 16.
Location: Northwest corner of Receiving Pen 14
Camera Direction: Southeast
Date/Time: September 10, 2014 12:16 P.M.



34: IMGP1396
Description: Cattle in Receiving Pen 14 and feed trough for the pen.
Location: Northwest corner of Receiving Pen 14
Camera Direction: Southeast
Date/Time: September 10, 2014 12:16 P.M.

35: IMGP1397
Description: Runoff from Receiving Pen 14 flows to the southwest under the gate.
Location: West side of Receiving Pen 14
Camera Direction: East
Date/Time: September 10, 2014 12:17 P.M.

36: IMGP1398
Description: Flow from Receiving Pen 14 flows to an inlet outside the northwest corner of Receiving Pen 16.
Location: Northwest corner of Receiving Pen 16
Camera Direction: Down
Date/Time: September 10, 2014 12:17 P.M.

37: IMGP1399
Description: Inlet for the runoff from Receiving Pen 14 at ground level by Receiving Pen 16.
Location: Northwest corner of Receiving Pen 16
Camera Direction: Southeast
Date/Time: September 10, 2014 12:17 P.M.

38: IMGP1400
Description: Pipe for flow from Receiving Pen 14 outlets in the hillside on the west side of the driveway. The hillside flows to the northern portion of the Lagoon. Outlet is under the vegetation.
Location: West of Receiving Pen 16
Camera Direction: Down
Date/Time: September 10, 2014 12:18 P.M.

Runoff of manure and process wastewater from Receiving Pen 16 flows to the southwest where some will flow into the Sort Alley. As described at the beginning of the walkthrough portion of this inspection report, manure and process wastewater from the Sort Alley flows to the south to a pipe inlet at ground level and from there to the Lagoon.

The portion of manure and process wastewater that doesn't flow into the Sort Alley, flows to the south and down the hillside to the Lagoon.

39: IMGP1401
Description: Runoff from Receiving Pen 16 flows to the west and southwest under the gate.
Location: Southwest corner of Receiving Pen 16
Camera Direction: East
Date/Time: September 10, 2014 12:19 P.M.

40: IMGP1402
Description: Some of the runoff from Receiving Pen 16 flows into the Sort Alley. Some will bypass the Sort Alley and flow to the south down the driveway.
Location: Southwest corner of Receiving Pen 16
Camera Direction: Southeast
Date/Time: September 10, 2014 12:19 P.M.

41: IMGP1403
Description: Runoff from Receiving Pen 16 flows down the driveway and would eventually flow to the Lagoon.
Location: South of Receiving Pen 16
Camera Direction: North
Date/Time: September 10, 2014 12:19 P.M.

EPA concluded the walkthrough of the facility and provided a closing conference with the owners. On the day of the inspection EPA did not see any areas of the facility that had the potential to cause a discharge of pollutants to either the intermittent unnamed tributary or Straddle Creek. Even though EPA did not review the NWIF permit on site, EPA is familiar with the IEPA General Permit and its requirements with respect to facility inspections and record keeping. EPA pointed out to the owners that, from the records review portion of the inspection, it did not appear that they were completing all the required inspections as per their permit.

2.3 Closing Conference and Post-Inspection

Table 12: Post Walk-Through

Were specific "Potential Violations" discussed with facility personnel?	Yes
Were specific "Areas of Concern" discussed with facility personnel?	Yes
Who were the Potential Violations or Areas of Concern discussed with?	
The facility owners.	
Compliance assistance materials given to facility personnel:	
EQIP Brochure from US Department of Agriculture NRCS	
IEPA Tax Certification Program for Livestock Waste Management Facilities	
U.S. EPA Small Business Resources Information Sheet	
U.S. EPA Concentrated Animal Feeding Operations Final Rulemaking – Fact Sheet	

Exit Time:	12:00 P.M.
Disposable Boots Left at Facility?	Yes
Vehicle Washed after leaving facility?	Yes
Date and Time that vehicle was washed:	9/10/14 at 5:45 P.M.

Table 13: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
EPA inspectors observed Straddle Creek from the north bank along the south side of the Lagoon. EPA inspectors observed the intermittent unnamed tributary from the east bank of the tributary along the west side of the Lagoon.

Table 14a: Sampling Information

Were samples taken?	No

3. POTENTIAL VIOLATIONS AND AREAS OF CONCERN

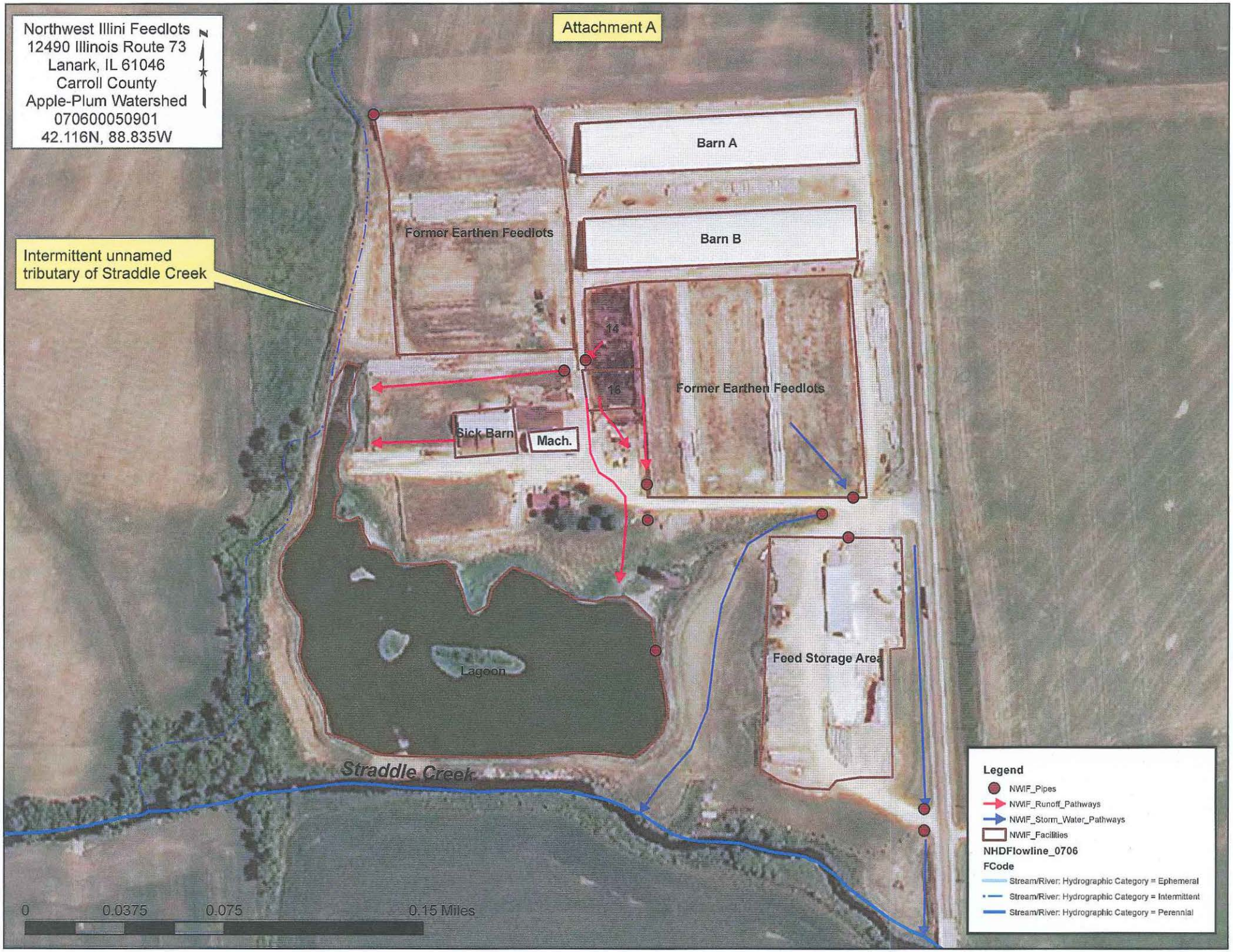
EPA did not see any areas of the facility that had the potential to cause a discharge of pollutants to either the intermittent unnamed tributary or Straddle Creek.

EPA observed the following:

1. Inspections of the depth of the manure in the lagoon were not being conducted at the proper time intervals (weekly). Records of the depth are to be kept as per Special Condition 7c of the NPDES Permit.
2. Inspections of the Livestock waste handling facilities were not being conducted at the proper time intervals (weekly). Records of the inspections are to be kept as per Special Condition 7e of the NPDES Permit.
3. Records of weekly inspections of the storm water diversions are not being maintained as per Special Condition 7j of the NPDES Permit.
4. Records of daily inspections of the water supply lines are not being maintained as per Special Condition 7k of the NPDES Permit.

4. LIST OF ATTACHMENTS

A) Aerial photograph of Northwest Illini Feedlots with buildings, waterways and discharge pathways labeled.


Northwest Illini Feedlots
12490 Illinois Route 73
Lanark, IL 61046
Carroll County
Apple-Plum Watershed
070600050901
42.116N, 88.835W
Attachment A
Intermittent unnamed tributary of Straddle Creek
Barn A
Barn B
Former Earthen Feedlots
14
16
Former Earthen Feedlots
Sick Barn
Mach.
Lagoon
Feed Storage Area
Straddle Creek
0
0.0375
0.075
0.15 Miles
Legend
NWIF_Pipes
NWIF_Runoff_Pathways
NWIF_Storm_Water_Pathways
NWIF_Facilities
NHDFlowline_0706
FCode
Stream/River: Hydrographic Category = Ephemeral
Stream/River: Hydrographic Category = Intermittent
Stream/River: Hydrographic Category = Perennial